

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

BROCK FREDIN,

Plaintiff,

--against--

JAMIE KREIL,

Defendant.

Case No. 20-CV-0929

NOTICE OF MOTION

TO: Anne M. Lockner
800 Lasalle Ave
Suite 2800
Minneapolis, MN 55402
Counsel for Jamie Kreil

TAKE NOTICE that as soon as the Court deems proper, or as soon as can be heard,

Plaintiff Brock Fredin will move the Court for an order:

1. Imposing *sua sponte* Rule 11 cross sanctions under the Court's inherent authority on Defendant Jamie Kreil and her counsel Anne M. Lockner, Haynes Hansen, and Ena Kovacevic;
2. Verification and acknowledgements:
 - a) The information contained in this document and the enclosed Memorandum of Law is true and correct to the best of my knowledge;
 - b) I have not been determined by any court to be a frivolous litigant and I am not the subject of an order precluding me from serving or filing this document;

- c) I am not serving or filing this document for any improper purpose, such as to harass the other party or to cause delay or needless increase in the cost of litigation or to commit a fraud on the court; and
- d) I understand that the court can order me to pay money to the other party, including the reasonable expenses incurred by the other party if the above statements are not true.

The grounds for this motion are as stated in the attached Memorandum of Law.

Dated: November 5, 2020
Saint Croix Co., WI



s/ Brock Fredin

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Plaintiff, Pro Se